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**Sent:** Monday, October 05, 2009 2:52 PM  
**To:** COM SBCC Home  
**Cc:** Siu, Jon; Hogan, John  
**Subject:** Comments on proposed state codes  
**Attachments:** 2009 IEBC Errata.pdf

Mr. DeVries and Councilmembers,

The Seattle Department of Planning and Development would like to add some comments to those we submitted last Friday.

First, we would like to encourage the Council to closely consider proposed Energy Code amendments that would require escalators to shut down when not occupied. There has been some research that suggests there may be danger of injury to users when the escalators resume operation. However, we are aware of escalators and moving walkways (particularly in Asia) that are controlled by occupancy sensors that shut the escalator completely off until someone nears the entry to it. The primary issue may be that people don't realize they need to get close to the escalator in order for it to start moving, rather than inherent danger in the sensors. If the Council chooses not to require the occupancy sensor, we believe the Codes should not prohibit using occupancy sensors to control escalators and moving walks.

Second, we have discovered an irregularity in the proposed International Existing Building Code amendments. Section 807.4.2 (proposed 2009 section number) requires a building evaluation whenever a building undergoes "substantial improvement". As defined by IEBC Section 202, "substantial improvement" only applies to the flood provisions of the code. We suggest the following revision to the definition to coordinate it with Section 807.4.2.

**SUBSTANTIAL IMPROVEMENT.** ~~((For the purpose of determining compliance with the flood provisions of this code, any))~~ A repair, alteration, addition, or improvement of a building or structure, the cost of which equals or exceeds 50 percent of the market value of the structure, before the improvement or *repair* is started. If the structure has sustained *substantial damage*, any repairs are considered *substantial improvement* regardless of the actual *repair* work performed. The term does not, however, include either:

1. Any project for improvement of a building required to correct existing health, sanitary, or safety code violations identified by the *code official* and that is the minimum necessary to assure safe living conditions, or
2. Any *alteration* of a historic structure, provided that the *alteration* will not preclude the structure's continued designation as a historic structure.

Finally, we have attached a copy of the most recent errata to the 2009 IEBC, published by ICC. Some of the errata are very significant and should be incorporated into the State Code.

Thanks for considering our comments,  
Maureen Traxler